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26 **UNITED STATES DISTRICT COURT**
27 **CENTRAL DISTRICT OF CALIFORNIA**

28 YITZCHOK FRANKEL *et al.*,

Plaintiffs,

v.

REGENTS OF THE UNIVERSITY
OF CALIFORNIA *et al.*,

Defendants.

Case No.: 2:24-cv-04702

**JOINT STIPULATION TO
MODIFY CASE SCHEDULE**

Judge: Hon. Mark C. Scarsi

*Admitted *pro hac vice*. ‡Not admitted to the D.C. Bar; admitted only in Texas. Supervised by licensed D.C. Bar members.

Plaintiffs Yitzchok Frankel, Joshua Ghayoum, Eden Shemuelian, and Dr. Kamran Shamsa (“Plaintiffs”) and Defendants Michael V. Drake, Gene D. Block, Darnell Hunt, Michael Beck, Monroe Gorden, Jr., Rich Braziel, and the Regents of the University of California¹ (“Defendants,” and together with “Plaintiffs,” the “Parties”) hereby stipulate and agree as follows:

WHEREAS, the Court entered a Schedule of Pretrial and Trial Dates (the “Case Schedule”) on December 18, 2024, (ECF No. 114 at 3);

WHEREAS, the Case Schedule included the following dates and deadlines;

<u>Case Deadline</u>	<u>Existing Schedule</u>
Non-expert discovery cut-off	8/4/25
Deadline to file Rule 56 motions	8/4/25
Expert disclosure (initial)	8/18/25
Expert disclosure (rebuttal)	8/25/25
Expert discovery cut-off	9/8/25
Last day to hear motions	9/8/25
Trial filings (first round)	11/10/25
Trial filings (second round)	11/17/25
Final Pretrial Conference	12/1/25
Jury Trial	12/16/25

¹ By operation of Fed. R. Civ. P. 25(d), Julio Frenk and Steve Lurie have been substituted into the matter in their official capacities as Chancellor of the University of California Los Angeles and Assistant Vice Chancellor of the University of California Los Angeles, respectively. The roles were previously held by Mr. Block and Mr. Braziel.

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2 **WHEREAS**, the parties have been actively engaged in fact
3 discovery, including the service of substantial productions of documents,
4 communications, and other electronically stored information;

5 **WHEREAS**, recent rulings by Magistrate Judge Donahue at a June
6 4, 2024 discovery conference and subsequent compromises resolving
7 disputes among the Parties as to the scope of document discovery have
8 necessitated that the Parties engage in the ongoing collection, review,
9 and production of a significant volume of additional material;

10 **WHEREAS**, the Parties agree that it would be most productive to
11 commence depositions after additional material is produced;

12 **WHEREAS**, the Parties are simultaneously engaging
13 cooperatively in the scheduling of depositions;

14 **WHEREAS**, certain scheduling difficulties have arisen given that
15 the individuals that the Parties intend to depose include a professor and
16 an undergraduate student traveling abroad during the summer recess,
17 two law students actively studying for the California bar exam to be
18 administered on July 29, 2025 and July 30, 2025, and individuals no
19 longer subject to Defendants' control;

20 **WHEREAS**, the existing Case Schedule sets the non-expert
21 discovery cut-off on the same day as the deadline to file Rule 56 motions
22 and prior to all deadlines for expert disclosures, meaning that the Parties
23 would have little to no time to incorporate information obtained towards
24 the close of fact discovery into their Rule 56 motions and would be unable
25 to rely on expert disclosures in such motions;

26 **WHEREAS**, the parties agree that it would aid in the adjudication
27 of this matter, including by facilitating the filing of Rule 56 motions
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capable of resolving the maximal number of issues prior to trial, if the Case Schedule were modified to (i) allow a modest amount of additional time for the Parties to complete fact depositions with the benefit of additional to-be-produced document discovery and (ii) slightly extend the deadline to file Rule 56 motions to allow adequate time for incorporation into Rule 56 motions of both information obtained in fact discovery and expert disclosure;

WHEREAS, the Parties have made no previous requests for continuances of any dates contained in the Case Schedule;

WHEREAS, the schedule proposed herein is not intended to delay the proceedings, requires no alterations to the Court's existing trial-related dates, and will not prejudice any party;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, that, subject to the Court's approval:

1. There is good cause to amend the Case Schedule as follows:

<u>Case Deadline</u>	<u>Revised Schedule</u>
Non-expert discovery cut-off (other than fact depositions)	8/4/25
Fact deposition cut-off	8/15/25
Expert disclosure (initial)	8/18/25
Expert disclosure (rebuttal)	8/25/25
Deadline to file Rule 56 motions	8/25/25
Expert discovery cut-off	9/15/25
Last day to hear motions	9/29/25

1 2. Nothing herein shall be deemed to constitute a waiver of any
2 rights, objections, or defenses that any party may have, and
3 this joint stipulation is made without prejudice to any other
4 or further application by a party to this Court or any other
5 court.

1 Dated: July 2, 2025

2 Respectfully submitted,

3 /s/ Adam M. Greene

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SIGNATURE ATTESTATION

Pursuant to Local Rule 5-4.3.4, I hereby attest that the other signatory listed, on whose behalf the filing is submitted, concurs in the filing's content and has authorized the filing.

Dated: July 2, 2025

Respectfully submitted,

/s/ Adam M. Greene

Adam M. Greene

*Attorney for Plaintiffs Yitzchok Frankel,
Joshua Ghayoum, Eden Shemuelian, and Dr.
Kamran Shamsa*